

## REMARKS

This is intended as a full and complete response to the Office Action dated January 4, 2006, having a shortened statutory period for response set to expire on April 4, 2006. Please reconsider the claims pending in the application for reasons discussed below.

Claims 30-32, 34, 36-39, 42, and 56 remain pending in the application and are shown above. Claims 30-32, 34, 36-39, 42, and 56 are rejected. Reconsideration of the rejected claims is requested for reasons presented below.

Claims 30 and 36 are amended to more clearly illustrate the claimed subject matter. Applicants submit that the changes made herein do not introduce new matter. Support for the amendment of claims 30 and 36 is provided by Figure 2 of the drawings.

Claims 30-32, 34, 36-39, 42, and 50 are rejected under 35 U.S.C. § 102(e) as being anticipated by *Woodruff, et al.* (U.S. Patent No. 6,497,801). Applicants respectfully traverse the rejection.

As amended, claims 30 and 36 recite an electrolytic cell comprising at least one insulating member positionable between adjacent segments of a plurality of anode segments, wherein no insulating members are positioned below adjacent anode segments. *Woodruff, et al.* shows insulating members that are between adjacent anode segments (46 and 40 in Figure 5; 141 and 140 in Figure 9; 240 in Figure 13) and that include insulating members that are positioned below adjacent anode segments (40 in Figure 5; 140 in Figure 9; 240 in Figure 13). Applicants respectfully submit that *Woodruff, et al.* does not teach, show, or suggest an electrolytic cell comprising at least one insulating member positionable or positioned between adjacent segments of a plurality of anode segments, wherein no insulating members are positioned below adjacent anode segments. Thus, *Woodruff, et al.* does not teach or suggest all of the limitations of claims 30 and 36. Applicants respectfully request withdrawal of the rejection of claim 30 and of claims 31-32 and 34, which depend thereon. Applicants respectfully request withdrawal of the rejection of claim 36 and of claims 37-39, 42, and 50, which depend thereon.

Claims 36-39, 42, and 50 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Woodruff et al.* in view of *Reed* (U.S. Patent No. 4,828,654). Applicants respectfully traverse the rejection.

As discussed above, *Woodruff, et al.* does not teach, show, or suggest an electrolytic cell comprising at least one insulating member positioned between adjacent segments of a plurality of anode segments, wherein no insulating members are positioned below adjacent anode segments. *Reed* shows and describes an anode support 36 from which anode segments are suspended. However, *Reed* does not teach or show at least one insulating member positioned between adjacent segments of a plurality of anode segments. Applicants respectfully submit that *Reed* does not teach or suggest an electrolytic cell that comprises at least one insulating member positioned between adjacent segments of a plurality of anode segments in addition to an anode support. As neither *Reed* nor *Woodruff, et al.* teaches or suggests at least one insulating member positioned between adjacent segments of a plurality of anode segments, wherein no insulating members are positioned below adjacent anode segments, *Woodruff et al.*, individually or in combination with *Reed*, does not teach or suggest all of the limitations of claim 36. Applicants respectfully request withdrawal of the rejection of claim 36 and of claims 37-39, 42, and 50, which depend thereon.

Claims 30-32, 34, 36-39, 42, and 50 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Wang* (U.S. Patent No. 6,391,116) in view of *Reed* or *Bhatt et al.* (U.S. Patent No. 5,156,730) and further in view of *Inoue* (U.S. Patent No. 5,244,550). The Examiner states that *Inoue* is directed to an electrolytic cell with concentric anodes and shows holders/insulators 4 positioned between electrode segments. The Examiner asserts that it would have been obvious to have insulating holders between the anode segments suggested by *Wang* in view of *Reed* or *Bhatt et al.* because the electrodes would have been better supported as taught by *Inoue*. Applicants respectfully traverse the rejection.

*Reed* is discussed above. *Wang* shows insulating walls between adjacent anode segments that allow individual anode segments to be exposed to different flows of electrolyte in distinct sub-plating baths defined by the insulating walls. *Wang* does not show or describe an insulating member that contacts adjacent anode segments.

*Bhatt, et al.* describes anode segments supported on one insulating rack 7. *Bhatt, et al.* does not show or describe an apparatus having both an anode support and at least one insulating member positioned between adjacent segments of the plurality of anode segments. *Inoue* describes a liquid separating apparatus that includes an outer electrode 1, an inner electrode 2, and a charging electrode 3 that is between the outer electrode and the inner electrode. *Inoue* also describes holders/insulators 4 between the three electrodes that define mixture passage spaces between the electrodes (Figure 1a, column 6, lines 11-23).

Applicants respectfully submit that there is no motivation or suggestion in *Wang, Reed, Bhatt et al.*, or *Inoue*, individually or in combination, to use *Inoue's* holders/insulators 4 between the anode segments of *Wang*. Applicants note that the apparatus of *Wang* already has mixture passage spaces between anode segments since the insulating walls between *Wang's* anode segments define separate plating baths. Applicants further submit that the Examiner has not provided any evidence to support his assertion that *Wang's* anode segments would have been better supported by including *Inoue's* holders/insulators 4 between the anode segments.

Thus, *Wang* in view of *Reed* or *Bhatt et al.* and further in view of *Inoue* does not teach, show, or suggest an electrolytic cell, comprising an electrolyte container comprising an anode base, a plurality of anode segments positioned in the electrolyte container, wherein at least one of the plurality of anode segments is mounted to at least one anode support mounted on the anode base, at least one insulating member positionable between adjacent segments of the plurality of anode segments, wherein no insulating members are positioned below adjacent anode segments, and an electrical source coupled to each of the anode segments, as recited in claim 30. Applicants respectfully request withdrawal of the rejection of claim 30 and of claims 31-32 and 34, which depend thereon.

*Wang* in view of *Reed* or *Bhatt et al.* and further in view of *Inoue* does not teach, show, or suggest an electrolytic cell, comprising an electrolyte container comprising an anode base, an electrolyte solution input port, a plurality of anode segments positioned in the electrolyte container, wherein at least one of the plurality of anode segments is mounted to at least one anode support mounted on the anode

base, and at least one insulating member positioned between adjacent segments of the plurality of anode segments, wherein one insulating member contacts two adjacent anode segments, and no insulating members are positioned below adjacent anode segments. Applicants respectfully request withdrawal of the rejection of claim 36 and of claims 37-39, 42, and 50, which depend thereon.

In conclusion, the references cited by the Examiner, alone or in combination, do not teach, show, or suggest the invention as claimed.

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



---

Keith M. Tackett  
Registration No. 32,008  
PATTERSON & SHERIDAN, L.L.P.  
3040 Post Oak Blvd. Suite 1500  
Houston, TX 77056  
Telephone: (713) 623-4844  
Facsimile: (713) 623-4846  
Attorney for Applicant(s)